

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SIDNEY GORDON and JEFFREY TAUBER,

Plaintiffs,

v.

SONAR CAPITAL MANAGEMENT LLC, et al.,

Defendants.

Case No. 11-CV-9665 (JSR)

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES
AND FOR ORDER REGARDING DISTRIBUTION OF SETTLEMENT FUNDS**

As set forth in the accompanying memorandum of law, Plaintiffs' Counsel respectfully moves that the Court award Plaintiffs' Counsel reasonable attorneys' fees of \$183,333 and expenses of \$125,873.67 from the \$550,000 fund established as a result of the class settlement with Noah Freeman (the "Settlement Fund"). Furthermore, because, as demonstrated in the accompanying memorandum, it would be uneconomical to distribute any of the Settlement Fund to the members of the Settlement Class, Plaintiffs' Counsel proposes that the Court authorize the payment of the amount remaining in the Settlement Fund after payment of the court awarded attorneys' fees and expenses to the Harvard Law School Program on Corporate Governance and/or the Columbia Law School Ira Millstein Center for Global Markets and Corporate Ownership as appropriate *cy pres* recipients or any other charitable or non-profit entity that the Court believes is appropriate under all of the circumstances.

Dated: August 5, 2016

Respectfully submitted,

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